

I, JOHN J. MCDERMOTT, being of full age, certify to the following:

1. I am an attorney with Langsam Stevens Silver & Hollaender LLP, counsel for Occidental Chemical Corporation (“OxyChem”), and am admitted to the United States District Court for the District of New Jersey.

2. I have personal knowledge of the facts set forth below.

3. Attached as **Exhibit A** is a true and correct copy of an October 5, 2016 news release by United States Environmental Protection Agency (USEPA) Region 2 entitled *EPA Secures \$165 Million Agreement with Occidental Chemical to Conduct the Work Needed to Start the Cleanup of the Lower Eight Miles of the Passaic River*.

4. Attached as **Exhibit B** is a true and correct copy of a January 13, 2022 letter from OxyChem to USEPA Region 2 regarding the Diamond Alkali Superfund Site.

5. Attached as **Exhibit C** is a true and correct copy of a June 27, 2022 letter from OxyChem to USEPA regarding Occidental Chemical Corporation Response to EPA Region 2 Letters dated March 2, 2022, and May 31, 2022.

6. Attached as **Exhibit D** is a true and correct copy of a September 18, 2017 letter from USEPA Region 2 to Potentially Responsible Parties for the Diamond Alkali Superfund Site regarding Allocation for Operable Unit 2.

Dated: December 23, 2022

By: /s/ John J. McDermott
John J. McDermott, Esq.